Case 1:22-cv-07756-**UAIVIQCONOMIA SIGNO** Page 1 of 13

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS	OCKET SHEET. (SEE INSTRUCTIONS ON NEXT FACE	DEFENDANT	S			
	6					
DASHON HINE	5	NHL				
(b) County of Residence (E.	of First Listed Plaintiff ERIE XCEPT IN U.S. PLAINTIFF CASES)	A COLUMN A C	County of Residence of First Listed Defendant NEW YORK (IN U.S. PLAINTIFF CASES ONLY)			
		NOTE: IN LAND	CONDEMNATION CASES, USE TH CT OF LAND INVOLVED.	HE LOCATION OF		
(c) Attorneys (Firm Name,	Address, and Telephone Number)	Attorneys (If Know	n)			
124 FULTON S	TREET #5C BUFFALO NY 14204	1185 6th Ave	, New York, NY 10036, U	JSA		
TEL: 518-616-6	416;	Phone Number	er: +1 212-789-2000			
II. BASIS OF JURISD	ICTION (Place an "X" in One Box Only)	III. CITIZENSHIP OF	PRINCIPAL PARTIES (1	Place an "X" in One Box for Plaintif, nd One Box for Defendant)		
U.S. Government Plaintiff	Federal Question (U.S. Government Not a Party)	Citizen of This State	PTF DEF I Incorporated or Pri of Business In T			
2 U.S. Government Defendant	4 Diversity (Indicate Citizenship of Parties in Item III)	Citizen of Another State	2 Incorporated and P of Business In A			
		Citizen or Subject of a Foreign Country	3 Foreign Nation	6 6		
IV. NATURE OF SUIT		MODERACIDE DEN ALTER	Click here for: Nature of S			
CONTRACT 110 Insurance	TORTS PERSONAL INJURY PERSONAL INJURY	RY 625 Drug Related Seizure	BANKRUPTCY 422 Appeal 28 USC 158	375 False Claims Act		
120 Marine	310 Airplane 365 Personal Injury	- of Property 21 USC 881	1 423 Withdrawal	376 Qui Tam (31 USC		
130 Miller Act 140 Negotiable Instrument	315 Airplane Product Product Liability Product Liability 367 Health Care/	y 690 Other	28 USC 157 INTELLECTUAL	3729(a)) 400 State Reapportionment		
150 Recovery of Overpayment & Enforcement of Judgment	320 Assault, Libel & Pharmaceutical Slander Personal Injury		PROPERTY RIGHTS	410 Antitrust 430 Banks and Banking		
151 Medicare Act	330 Federal Employers' Product Liability		820 Copyrights 830 Patent	450 Commerce		
152 Recovery of Defaulted Student Loans	Liability 368 Asbestos Persona 340 Marine Injury Product	al	835 Patent - Abbreviated New Drug Application	460 Deportation 470 Racketeer Influenced and		
(Excludes Veterans)	345 Marine Product Liability	DELY LABOR	840 Trademark	Corrupt Organizations		
153 Recovery of Overpayment of Veteran's Benefits	Liability PERSONAL PROPER 350 Motor Vehicle 370 Other Fraud	RTY LABOR 710 Fair Labor Standards	880 Defend Trade Secrets Act of 2016	480 Consumer Credit (15 USC 1681 or 1692)		
160 Stockholders' Suits 190 Other Contract	355 Motor Vehicle 371 Truth in Lending Product Liability 380 Other Personal	Act 720 Labor/Management	SOCIAL SECURITY	485 Telephone Consumer Protection Act		
195 Contract Product Liability	360 Other Personal Property Damage	e Relations	861 HIA (1395ff)	490 Cable/Sat TV		
196 Franchise	Injury 385 Property Damage 362 Personal Injury - Product Liability	[money]	862 Black Lung (923) 863 DIWC/DIWW (405(g))	850 Securities/Commodities/ Exchange		
DE LA DE OBERGE	Medical Malpractice	Leave Act	864 SSID Title XVI	890 Other Statutory Actions		
REAL PROPERTY 210 Land Condemnation	CIVIL RIGHTS PRISONER PETITIO 440 Other Civil Rights Habeas Corpus:	790 Other Labor Litigation 791 Employee Retirement	865 RSI (405(g))	891 Agricultural Acts 893 Environmental Matters		
220 Foreclosure	441 Voting 463 Alien Detainee	Income Security Act	FEDERAL TAX SUITS 870 Taxes (U.S. Plaintiff	895 Freedom of Information		
230 Rent Lease & Ejectment 240 Torts to Land	x 442 Employment 510 Motions to Vacat 443 Housing/ Sentence	ite ;	or Defendant)	Act 896 Arbitration		
245 Tort Product Liability 290 All Other Real Property	Accommodations 530 General 445 Amer. w/Disabilities - 535 Death Penalty	IMMIGRATION	871 IRS—Third Party 26 USC 7609	899 Administrative Procedure Act/Review or Appeal of		
250 All Other Real Froperty	Employment Other:	462 Naturalization Applicati	and the same of th	Agency Decision		
	446 Amer. w/Disabilities - 540 Mandamus & Other 550 Civil Rights	ther 465 Other Immigration Actions		950 Constitutionality of State Statutes		
	448 Education 555 Prison Condition 560 Civil Detainee -	1				
	Conditions of					
V. ORIGIN (Place an "X" i	Confinement Confinement					
x 1 Original 2 Ren	moved from 3 Remanded from the Court Appellate Court		sferred from 6 Multidistric her District Litigation - ify) Transfer			
	Cite the U.S. Civil Statute under which you a			Diecerne		
VI. CAUSE OF ACTIO	Title 42 U.S.C., Section 3631					
	Brief description of cause: laws prohibit punishing job applicants or emplo	oyees for asserting their rights to be	e free from employment discrimina	tion including harassment.		
VII. REQUESTED IN CHECK IF THIS IS A CLASS ACTION DEMAND \$ CHECK YES only if demanded in complete			f demanded in complaint:			
VIII. RELATED CASI	E(S)					
IF ANY	(See instructions): JUDGE		DOCKET NUMBER			
DATE September 0, 2022		TTORNEY OF RECORD	/ .			
September 9, 2022 FOR OFFICE USE ONLY	Dashon Hines	les has				
	MOUNT APPLYING IFP	JUDGE	MAG. JUD	OGE		

UNITED STATES DISTRICT COURT

101	i tiic
Southern Distric	et of New York
civil	Division
DASHON HINES	Case No.
	(to be filled in by the Clerk's Office)
Plaintiff(s) (Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.) -V- NHL)) Jury Trial: (check one) Yes No No No No No No No No No N
Defendant(s) (Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)))))

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	DASHON HINES		
Street Address	124 FULTON STREET #5C		
City and County	BUFFALO and ERIE		
State and Zip Code	NEW YORK and 14204		
Telephone Number	518-616-6416		
E-mail Address	dashonhines@gmail.com		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

Defendant No. 1				
Name	NHL			
Job or Title (if known)	NATIONAL HOCKEY ASSOCIAON			
Street Address	1185 6th Avenue			
City and County	New York and New York			
State and Zip Code	New York and 10036			
Telephone Number	(212) 789-2000			
E-mail Address (if known)	Julie.Krzyzanowski@sabres.com			
Defendant No. 2				
Name				
Job or Title (if known)	·			
Street Address				
City and County				
State and Zip Code				
Telephone Number				
E-mail Address (if known)				
Defendant No. 3	*			
Name				
Job or Title (if known)				
Street Address	4			
City and County				
State and Zip Code	ŧ			
Telephone Number				
E-mail Address (if known)				
Defendant No. 4				
Name				
Job or Title (if known)				
Street Address				
City and County				
State and Zip Code				
Telephone Number				
E-mail Address (if known)				

The address at which I sought employment or was employed by the defendant(s) is

Name	BUFFALO SABRES / KEYBANK CENTER		
Street Address	One Seymour H. Knox III Plaza		
City and County	Buffalo and Erie		
State and Zip Code	New York and 14203		
Telephone Number	(716) 855-4443		

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to (check all that apply):

	Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).
	(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)
	Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.
	(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)
	Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.
	(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)
V	Other federal law (specify the federal law):
	https://www.eeoc.gov/retaliation
	Relevant state law (specify, if known):
	Relevant city or county law (specify, if known):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A.	The discrimina	tory conduct of which	ch I complain in this action includes (check all that apply):
		Failure to hire me.	
	V	Termination of my	employment.
		Failure to promote	e me.
		Failure to accomm	nodate my disability.
		Unequal terms and	conditions of my employment.
	~	Retaliation.	
	Secretarion de la companya del companya de la companya del companya de la companya del la companya de la compan	Other acts (specify):	
		Opportunity Comm	grounds raised in the charge filed with the Equal Employment nission can be considered by the federal district court under the at discrimination statutes.)
B.	It is my best re	collection that the al	leged discriminatory acts occurred on date(s)
	September 8, 2022		
C.	I believe that d		ting these acts against me. mitting these acts against me.
D.	Defendant(s) d	iscriminated against	me based on my (check all that apply and explain):
	V	race	African American
		color	
		gender/sex	
		religion	
		national origin	
		age (year of birth)	(only when asserting a claim of age discrimination.)
		disability or percei	ved disability (specify disability)
F	The facts of my	v case are as follows	Attach additional pages if needed



KBC Attendance

4 messages

Krzyzanowski, **Julie** < Julie.Krzyzanowski@sabres.com> To: "dashonhines@gmail.com" < dashonhines@gmail.com>

Thu, Sep 8, 2022 at 12:13 PM

Good Afternoon Dashon:

We had you on the schedule today for 8am but you did not arrive. We do have you on the schedule again tomorrow for 8am. We hope all is well and wanted to know if you planned to work tomorrow so we can staff accordingly.

Thank you,

Julie



Julie Krzyzanowski | Operations Coordinator // Arena Operations

BUFFALO SABRES / KEYBANK CENTER

One Seymour H. Knox III Plaza, Buffalo, NY 14203

(0)716-855-4443

STOP HATE. END RACISM. CHOOSE LOVE.

Dashon Hines <dashonhines@gmail.com>
To: "Krzyzanowski, Julie" <Julie.Krzyzanowski@sabres.com>

Thu, Sep 8, 2022 at 1:06 PM

Hey Julie, we just spoke on the phone. I just wanted an opportunity to speak with you in person today about some concerns as an employee. Please find time for us to meet today. I am scheduled to work tomorrow at 8am.



Employee complaint

Fierle, Erin <Erin.Fierle@psentertainment.com>
To: Dashon Hines <dashonhines@gmail.com>

Thu, Sep 8, 2022 at 6:35 PM

Hi Dashon:

Thank you for speaking with me this evening per your voicemail and email request.

From our conversation today I want to acknowledge your formal complaint regarding your orientation experience and will begin an investigation.

At this time, we will not be able to adjust your shift or supervisor and given your statement that you are not comfortable with the equipment or working with the supervisor we will delay your start date until the investigation is complete. I hope to have this completed early next week.

On additional item – please see the attached EAP information where you can find resources for grief counselors. Again, sorry for your loss.

If you have further questions, please feel free to reach out to me, otherwise I will be in touch with you next week.

Thank you,

Erin



Frin Fierle - SPHR SHRM-SCP MBA | Director of HR // Human Resource

PEGULA SPORTS + ENTERTAINMENT
79 Perry St., STE 300 Buffalo, NY 14203

STOP HATE. END RACISM. CHOOSE LOVE.

[Quoted text hidden]

2 attachments

image005.png 1K

1The EAP is Here for You_2020_IBH Guardian.pdf

Pro Se	7 (Rev. 12/1	6) Complaint for Employment Discrimination
distantina de consession de A		KBC Attendance
		Krzyzanowski, Julie Sep 8, 2022, 12:14 PM (1 day ago) to me
		Good Afternoon Dashon:
		(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)
IV.	Exhaus	tion of Federal Administrative Remedies
	A.	It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on <i>(date)</i> U.S. Equal Employment Opportunity Commission 525-2022-02401.
	В.	The Equal Employment Opportunity Commission (check one): has not issued a Notice of Right to Sue letter. issued a Notice of Right to Sue letter, which I received on (date) 09/09/2022 (Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment
		Opportunity Commission to this complaint.)
	C.	Only litigants alleging age discrimination must answer this question.
		Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):
		60 days or more have elapsed. less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.



Inquiry 525-2022-02401 Dashone Hines v. Pegula Sports & Entertainment

2 messages

NELIDA SANCHEZ <NELIDA.SANCHEZ@eeoc.gov>
To: "Dashonhines@gmail.com" <Dashonhines@gmail.com>

Wed, Sep 7, 2022 at 2:54 PM

Good afternoon,

I am the investigator assigned to your case regarding the above-mentioned inquiry of employment discrimination. I received and reviewed your inquiry. Based on the information that you submitted, it does not seem that we will be conducting an investigation regarding your allegations.

It seems that your allegations did not establish a prima facie case. A Charging Party (you) must provide the building blocks which would lead to reasonably believe there was a violation to the Law. Specifically, you were unable to establish that there was a connection between your bases- race, age, national origin, gender, color, religion, disability discrimination, genetic information, and retaliation, and the harm that you alleged- unlawful hiring process under the "at will" process. Basically, you have not provided any supportive information to establish that you were discriminated against because of any of those bases (the laws enforced by the EEOC.) Please be aware that the EEOC does not have jurisdiction to investigate complaints regarding New York State "at will" employment requirement.

Therefore, your inquiry is closed. However, if you decide to file a charge of discrimination with the EEOC, no investigation will be conducted. If you insist that you wish to file a charge of discrimination, I will draft a charge of discrimination with the information already assembled; then your charge will be dismissed without investigation, and you will be provided with a Notice of Rights to Sue which will entitles you to file suit against the Respondent named in the charge within 90 days of receipt of said notice. If we do not hear from you by **September 14, 2022**, we will assume that you decided not to file a charge of discrimination against Respondent, and your inquiry will remain closed. If you decide to file a charge of discrimination and obtain a Notice of Right to Sue, please send me an email no later than September 14, 2022, expressing your wish to proceed with the filing of your charge. Thank you.

Nelly Sanchez

US Equal Employment Opportunity Commission

Olympic Towers

300 Pearl St., Suite 450

Buffalo, NY 14202

nelida.sanchez@eeoc.gov

Phone: (716) 431-5017

Main: (716) 431-5007

Fax: Bufffaxmain@eeoc.gov



525-2022-02401 Dashon Hines Sr. v. Pegula Sports & Entertainment

NELIDA SANCHEZ <NELIDA.SANCHEZ@eeoc.gov> To: "Dashonhines@gmail.com" < Dashonhines@gmail.com> Thu, Sep 8, 2022 at 8:26 AM

Good morning,

Today. I sent you via Portal a drafted charge of discrimination based on the information that you provided. The drafted charge is only a summary of your allegations. Please visit EEOC Portal to review and electronically sign your charge of discrimination. Your signature is due no later than September 15, 2022. If you do not sign your charge of discrimination or contact us by September 15, 2022, we will assume that you no longer wish to file a charge of discrimination against Respondent, and your inquiry will be closed. If you have questions, you may contact me at (716) 431-5017. If changes or modifications to the initial drafted charge should be made, you will have only ONE chance to make those modifications. Therefore, make sure that you let us know about all/any changes to your charge (after you review your drafted charge via Portal.)

CHARGE SIGNING INSTRUCTION

To sign your Charge, log on to the EEOC Portal at: https://publicportal.eeoc.gov/portal/SignIn.aspx? From=Home

- 1. Scroll to the bottom of the page and click "No" box declining to recommend changes
- 2. Click "SIGN AND FILE" button
- Check the "Checkbox" in the popup window attesting to the truthfulness of your Charge
- 4. Click the "FILE CHARGE" button

IF MODIFICATIONS TO THE DRAFTED CHARGE ARE NEEDED

As it was previously mentioned, you will have only one chance to suggest modifications to your charge of discrimination. Therefore, I recommend that you do NOT input comments or attempt to communicate with EEOC via the comments box (in the Portal) as doing so may delay your Charge. Instead, call (at 716-431-5017) or email me with questions or concerns.

If you have decided not to file a Charge, please notify me by return email.

As a reminder, please be aware that we will appreciate if all your contact/information is done by accessing EEOC Portal. All personnel is mostly teleworking, so our physical office is close. Therefore, I do not have access to regular mail. Accessing EEOC Portal will give secure access to the EEOC's digital file and direct communication with our office. Specifically, the EEOC Public Portal will allow you to review, digitally sign, and file the charge; after you sign your charge you will have all day access to submit any additional supportive information, check the status of your case, and many other functions. The entire EEOC has moved to use the EEOC Portal which has been extremely helpful and a time saver during this Pandemic (Covid-19.)

If you experience system or log in issues with the EEOC Digital Charge System or Online Portal, please contact our Digital Support Desk with questions or concerns at digitalsupport@eeoc.gov or call the Help Desk at 1-800-569-7118.





Filing with EEOC

Assessment

Inquiry

Schedule nterview

More Details

I want this charge filed with both the EEOC and the State or local Agenc agencies if I change my contact information and I will cooperate fully witl of my charge in accordance with their procedures.

I understand by signing below that I am filing a charge of employment die EEOC. I understand that the EEOC is required by law to give notice of the includes my name, to **Pegula Sports & Entertainment** I also understant only investigate charges of job discrimination based on race, color, religion pregnancy, sexual orientation and gender identity), national origin, disabilities information, or based on retaliation for filing a charge of employment discrimination, or complaining to the discrimination.

I swear (or affirm) under the penalty of perjury that: (1) I am the personand (2) that the information contained in this charge is true and correct.

X Mr. Dashon M Hines Sr. ------ Signed Hines Sr. On 09/08/22 8:45:41

\$1,00	0,000.00 (One Million Dollars)
	s.
Certif	ication and Closing
and be unnec nonfri evider oppor	Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, informative lief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause essary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a volous argument for extending, modifying, or reversing existing law; (3) the factual contentions have attary support or, if specifically so identified, will likely have evidentiary support after a reasonable funity for further investigation or discovery; and (4) the complaint otherwise complies with the ements of Rule 11.
requii	
A.	For Parties Without an Attorney
	I agree to provide the Clerk's Office with any changes to my address where case-related papers maserved. I understand that my failure to keep a current address on file with the Clerk's Office may rein the dismissal of my case.
	Date of signing: 09/09/2022
	Signature of Plaintiff
	Printed Name of Plaintiff Dashon Hines
В.	For Attorneys
	Date of signing:
	Signature of Attorney
	Signature at Attamax

Bar Number

Street Address

Name of Law Firm

State and Zip Code Telephone Number E-mail Address

CERTIFICATE OF SERVICE BY MAIL

State of New York :
SS:
County of Livie : (,
served a copy of the following document(s):
Employment Oiscvinination (Specify document(s)
on Cleve of the Court (Name of person/Addressee)
at: One Bowling Green (Address to which document(s)
New York NY 10004-1408 were sent)
by mailing and depositing a true and correct copy of said document(s) in a mailbox located
at: 124 Fulton Of Buffalo RY 14204
on the following date: September 9, 2022
I certify that the foregoing is true and correct.
DATED: Signature of Plaintiff
Signature of Plaintiff